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March 12, 2021

**VIA ECF**

Honorable Ronnie Abrams  
United States District Judge  
United States District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: *VistaJet US Inc. v. Wild Wonder LLC***  
**Case No. 20-cv-05974 (RA) (GG)**

Dear Judge Abrams:

This firm represents defendant Wild Wonder LLC (“Defendant”) in the above-referenced action. We submit this letter, on consent of plaintiff, to request a three-week adjournment of the post-fact discovery conference scheduled for March 12, 2021 at 10:00 a.m.

Pursuant to the Case Management Order dated October 29, 2020, fact discovery was to be concluded by February 23, 2021. All discovery is to be completed no later than April 15, 2021. The parties have served responses and objections to Requests for Production and Interrogatories. No depositions have been conducted.

Unfortunately, from mid-January through mid-February, I was caring for my parents, both of whom contracted Covid-19, and I was quarantining. I am the sole attorney in my office with knowledge of this case, and I was not able to devote the necessary time and resources to reviewing plaintiff’s discovery responses and scheduling depositions. In preparing for the scheduled conference, I advised plaintiff’s counsel that there are certain deficiencies in plaintiff’s discovery responses and objections that need to be addressed.

Counsel have scheduled a meet-and-confer to discuss the discovery dispute. In addition, the parties have continued to discuss a settlement of the case. In light of the foregoing, I respectfully request that the Court adjourn the post-fact discovery conference for three (3) weeks.



If the Court has any questions or concerns regarding the foregoing, I will make myself available at the Court's convenience.

Very truly yours,

*s/Gayle S. Gerson*

Gayle S. Gerson

GSG/cd

cc: Christopher Carlsen (via email)

Application granted. The post-fact-discovery conference is hereby adjourned to April 9, 2021 at 3:30 p.m.

The joint status update letter described at Dkt. 18 shall be due April 2, 2021.

The conference will be held by telephone using the following information: Call-in Number: (888) 363-4749; Access Code: 1015508. This conference line is open to the public.

SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Ronnie Abrams', written over a horizontal line.

Hon. Ronnie Abrams

03/15/2021